

EXHIBIT 20

DECLARATION OF PETER OWUSU

I, Peter Owusu, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am at least 18 years of age and am competent to sign this declaration. I make this declaration based on my personal knowledge except where I have indicated otherwise. If called as a witness, I could and would testify competently and truthfully to these matters.
2. I was born in Ghana on August 22, 1979. I am 40 years old.
3. I am currently detained at Stewart Detention Center in Lumpkin, Georgia. I have been detained here since approximately January 24, 2020.
4. I am seeking asylum, withholding of removal and protection under the Torture Convention due to the persecution I experienced in my home country.
5. I have difficulty breathing, due to a stab wound I suffered prior to fleeing my country. At the last place I was detained, I was taken for an X-ray and given a breathing machine, but I haven't been able to access it at Stewart. I need the machine for my lungs, because I find it difficult to breathe, especially at night and when the temperature in the room is low. My difficulty breathing has affected my ability to sleep; as a result, I can often only sleep for a few hours at night.

6. Due to the wound I sustained, I also have other complications, including the stitches not being properly healed, ongoing stomach pain, problems with digestion, feelings of dizziness and headaches. My heart races when I lift something heavy and my heart beats so fast I cannot run.
7. I have spoken with the medical staff at Stewart about these issues and have asked to see a doctor but I haven't yet been able to see one and I have just been told to take a painkiller. I am very afraid of this virus and of becoming sick from it, especially given my ongoing health issues, including with breathing and my heart racing.
8. The living conditions at Stewart also make me very afraid of this virus, especially since I have heard people coughing in the room where I sleep. There are over 60 people in bunk beds where I sleep, and the beds are so close together that we can easily reach out and touch each other. There is someone sleeping above me and it is not possible to maintain distance between us.
9. The eating conditions are similarly cramped. We sit four at a table and are so close to each other, it is impossible to stay more than six feet away from another person. There are also more people coming to the facility each day.
10. My work in the detention center preparing food in the kitchen also puts me at risk, since there are 38-40 people working at each shift and the quarters in

the kitchen are cramped. Despite the virus, nothing has changed in terms of the sleeping, eating or work conditions. We are still all sleeping, eating and working very close to one another, which makes me very afraid for my health and safety.

11. In addition, I haven't seen any increase in medical staffing or screening, despite the virus, and while some guards have protective gear, others do not. Although the medical staff know about my health concerns, I haven't been able to see a doctor and I haven't been evaluated to determine whether any special steps are needed to protect me from the illness. I used to try to spend time outside, since that seemed to help a little with my breathing condition, but since the virus, I have not been able to go outside since they have stopped allowing that. I am scared for my life because of this virus and the conditions here at Stewart.

12. If I am released from detention, I would live with my uncle in Houston, TX. I talk to him regularly and he has offered to take me in. There is room for me there to socially distance and isolate myself from others.

13. I will comply with any applicable conditions of release including attending check-ins and immigration court hearings.

14. I have authorized my attorney to sign on my behalf given the difficulty of arranging visitation and travel in light of the current COVID-19 pandemic. If required to do so, I will provide a signature when I am able to do so.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 2, 2020 at Watertown, Massachusetts.



Sabrineh Ardalan on behalf of Peter Owusu

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ATTORNEY DECLARATION

I, Sabrineh Ardalan, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. My name is Sabrineh Ardalan. I am a licensed attorney in good standing in the state of New York.
2. I represent the declarant, Peter Owusu, in his immigration matters. Out of necessity in light of the COVID-19 pandemic, I signed Peter Owusu's declaration on his behalf and with his express consent.
3. ICE is oftentimes requiring legal visitors to provide and wear personal protective equipment, including disposable vinyl gloves, surgical masks, and eye protection while visiting any detention facility. These supplies are not easily accessible, given the increase in demand. Any available supplies are prioritized to hospitals and other medical facilities that are experiencing dangerous shortages.
4. There are documented cases of COVID-19 in all fifty U.S. states and most inhabited U.S. territories. The Center for Disease Control and Protection (CDC) issued statements warning that individuals are at a higher risk of infection when traveling. Because I live in Massachusetts, visiting Lumpkin, Georgia would require air travel.

5. In light of the above, to protect public health, I am not able to travel to Lumpkin, Georgia, to obtain my client's signature.
6. I spoke with Peter Owusu via video-teleconferencing and he has confirmed the accuracy of the information in his declaration. Peter Owusu has confirmed that I can sign on his behalf, as reflected in his declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 2, 2020 at Watertown, Massachusetts.



Sabrineh Ardalan, Esq.

Attorney for Peter Owusu

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